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26 Attorneys for Defendant
27 COUNTY OF SANTA CLARA

28 **UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

29 JANE DOE, individually and on behalf of others
similarly situated,

30 Plaintiff,

31 v.

32 THE COUNTY OF SANTA CLARA d/b/a
33 SANTA CLARA VALLEY MEDICAL
34 CENTER,

35 Defendant.

36 No. 23-CV-04411 WHO

37 **JOINT STIPULATION FOR EXTENSION
38 OF TIME FOR FILING RESPONSE AND
39 REPLY BRIEFS REGARDING
40 DEFENDANT COUNTY OF SANTA
41 CLARA'S MOTION TO DISMISS**

42 Date: May 1, 2024

43 Time: 2:00 pm

44 Crtrm: 2, 17th Floor

45 Judge: Hon. William H. Orrick

1 Pursuant to Civil Local Rules 6-1, 6-2, and 7-12, Plaintiff Jane Doe (“Plaintiff”) and
2 Defendant County of Santa Clara (“Defendant”), by and through their respective counsel of record,
3 hereby stipulate as follows.

4 WHEREAS Defendant filed a Motion to Dismiss, (ECF No. 47), and Request for Judicial
5 Notice, (ECF No. 48), on March 14, 2024;

6 WHEREAS Plaintiff’s Response to Defendant’s Motion to Dismiss and Request for Judicial
7 Notice are currently due on March 28, 2024;

8 WHEREAS Defendant’s Reply in Support of its Motion to Dismiss and Request for Judicial
9 Notice is currently due seven days after the Response;

10 WHEREAS because of counsel’s vacation and other scheduling conflicts, counsel have
11 agreed to a one-week extension of both the Response and Reply deadlines;

12 WHEREAS the proposed extensions will not alter the hearing scheduled on the Motion to
13 Dismiss and Request for Judicial Notice for May 1, 2024;

14 NOW, THEREFORE, the parties agree and jointly request that the Court order as follows:

15 1. Plaintiff shall Respond to Defendant’s Motion to Dismiss and Request for Judicial
16 Notice no later than April 4, 2024;

17 2. Defendant shall file any Reply in Support of its Motion to Dismiss and Request for
18 Judicial Notice no later than April 18, 2024; and

19 3. The Hearing on Defendant’s Motion to Dismiss and Request for Judicial Notice shall
20 remain scheduled for May 1, 2024.

21
22 Dated: March 25, 2024

Respectfully submitted,

23 By: /s/ Michael A. Caddell

24 MICHAEL A. CADDELL
25 CYNTHIA B. CHAPMAN
AMY E. TABOR
CADDELL & CHAPMAN

26 Attorneys for Plaintiff JANE DOE

1 Dated: March 25, 2024

By: /s/ Xavier M. Brandwajn

TONY LOPRESTI
COUNTY COUNSEL
XAVIER M. BRANDWAJN
JOSÉ L. MARTIN
Deputy County Counsel

Attorneys for Defendant
COUNTY OF SANTA CLARA

6 **CERTIFICATION**

7 Pursuant to Civil Local Rule 5-1(i)(3), I attest that the concurrence of Xavier Brandwajn in
8 the filing of this stipulation has been obtained.

9 /s/sAmy E. Tabor
10 Amy E. Tabor

11 **PURSUANT TO STIPULATION, IT IS HEREBY ORDERED** that:

12 1. Plaintiff shall Respond to Defendant's Motion to Dismiss and Request for Judicial
13 Notice no later than April 4, 2024.

14 2. Defendant shall file any Reply in Support of its Motion to Dismiss and Request for
15 Judicial Notice no later than April 18, 2024.

16 3. The Hearing currently scheduled for May 8, 2024, remains scheduled at 2:00 p.m.

17 **THE PARTIES ARE REMINDED THAT THE BRIEFING SCHEDULE REQUIRED**
18 **BY THE LOCAL RULES IS SET SO THAT REPLIES ARE FILED AT LEAST 14 DAYS,**
19 **NOT 13 DAYS, IN ADVANCE OF THE HEARING. See Civ. L. R. 7-2(a) & 7-3.**

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21 Dated: March 26, 2024

22 
23 THE HONORABLE WILLIAM H. ORRICK
U.S. District Court Judge

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